

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

BRADLEY ERHART,

Plaintiff

v.

NANCY ERHART,

Defendant.

Case No.: 1:21-cv-1829-TWP-TAB

MOTION FOR LEAVE TO AMEND COMPLAINT

Plaintiff Bradley Erhart moves the Court to grant him leave pursuant to FRCP 15 to file the attached amended complaint:

1. On June 21, 2021, Bradley Erhart filed a complaint against Nancy Erhart pro se, using the court-provided complaint form.

2. Since filing his original complaint, Bradley Erhart has engaged counsel and exchanged initial disclosures with Nancy Erhart.

3. Bradley Erhart now seeks leave to amend his complaint to clarify the claims for breach of fiduciary duty asserted against Nancy Erhart.

4. FRCP 15(a)(2) states “The court should freely give leave when justice so requires.”

5. No discovery has been conducted by either party, and no party will be prejudiced by the granting of leave to amend.

WHEREFORE, Bradley Erhart respectfully requests that he be granted leave to amend his complaint and that the amended complaint attached to this motion as **Exhibit A** be deemed filed on the date this motion is granted.

Date: March 14, 2022

Respectfully submitted,

/s/ Kimberly S. DalSanto

Kimberly S. DalSanto, Atty. No. 32666-03

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 14, 2022, the foregoing was filed electronically with the Court's ECF system and served upon all parties of record.

/s/ Kimberly S. DalSanto